

00876997

Exhibit 2

VERIFIED BILLING STATEMENT OF SERVICES AND HOURS
PERFORMED BY JENNIFER G. DAMICO

The undersigned hereby verifies that the attached statement accurately represents the services performed and hours incurred by attorney Jennifer G. Damico in the matter of *Jones v. Corizon Health, Inc., et. al.*

/s/ Jennifer G. Damico (P51403)

DATE	SERVICE	HOURS
1/14/2020	Draft and File Complaint - 58 pages, six counts, 23 defendants	5.50
2/25/2020	Review and file return of Waiver of Services for Defendants Clark, Thorne, Knott, Kok, Stella, Kent County, Jourden, Grimmatt, MCGinnis, Cooper, Plugge, & Bogner.	1.10
2/26/2020	Review file materials in preparation for drafting Rule 26(a) disclosures, including all records received from FOIA's (Kent County Jail, Corizon Health, Kent County ME, Metro Health, 59th District Court and death certificate)	3.70
3/2/2020	Review and file return of Waiver of Services for Defendants, Corizon Health, Inc., Byrne, Furnace, Fielstra, Navarro, Sherwood, and unknown party.	0.80
3/3/2020	Begin drafting Rule 26(a) disclosures	2.10
3/9/2020	Receipt and review of appearance by Ronald Chapman on behalf of the Corizon Defendants	0.10
3/10/2020	Receipt and review of acknowledgment of service on behalf of Chad Goetterman	0.10
3/11/2020	Continue drafting Rule 26(a) disclosures	1.70
3/19/2020	Receipt and review of Notice of Rule 16 Scheduling Conference for 4/15/2020 with status report due 4/10/2020	0.20
3/30/2020	Receipt and review of appearance by Ronald Chapman on behalf of Daniel Card, Corizon Health, and Janice Steimel	0.10
3/30/2020	Receipt and review of Corizon Defendants' Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6), draft stipulation and order to amend complaint to reflect properly-named	3.60
3/31/2020	File proposed stipulation and order to amend complaint to reflect properly-named defendants	0.20
4/1/2020	Review file in preparation for drafting Rule 16 Joint Discovery Plan	2.30
4/1/2020	Receipt and review Order granting Stipulation to Amend Complaint reflect proper names of defendants	0.10
4/2/2020	Research case law re: intoxication as absolute defense, corporate policies not establishing standard of care, and ordinary negligence vs. malpractice (for medical malpractice claim) in preparation for drafting response to Corizon Defs' 12(b)(6) Motion to Dismiss	4.70
4/4/2020	Continue drafting Rule 16 Joint Discovery Plan	1.50
4/3/2020	Telephone conference with nursing and corrections expert, Valerie Tennesen, RN	0.70
4/5/2020	Research case law re: delay in treatment vs denial of care, dispute in amount or quality of medical treatment not amounting to constitutional violation, looking for specific cases of alcohol withdrawals and time delays (deliberate indifference claim)	5.70
4/7/2020	Email to Atty Chapman re: Rule 16 Joint Discovery Plan identifying areas that need defendants' attention	0.30
4/8/2020	Review and revise Timeline of Events	1.40
4/9/2020	Receipt and review of appearance by Timothy Eagle on behalf of the Kent County Defendants	0.10
4/9/2020	Finalized Rule 16 Joint Discovery Plan and obtain permission from defense counsel to file via email	0.50
4/10/2020	File Rule 16 Joint Discovery Plan	0.10
4/10/2020	Receipt and review of Answer to Complaint by Kent County Defendants, affirmative defenses and reliance upon jury demand	0.40
4/11/2020	Begin drafting Response to Corizon Defendants' Motion to Dismiss - Motion, Table of Contents, Index of Authorities, Issues Presented and Controlling/Most Appropriate Authority Sections	7.10
4/12/2020	Continue drafting Motion response and begin drafting Brief in Response to Corizon Defendants' Motion to Dismiss, Introduction, Statement of Facts, Standard of Review, Timeline of Events Sections.	6.30

4/13/2020	Continue drafting Brief in Response to Motion, Argument Sections, Intoxication Defense, Gross and Ordinary Negligence, Deliberate Indifference (Byrne) and Monell Claim (Corizon)	9.29
4/15/2020	Draft Declaration of Jennifer G. Damico in support of Response to Defendant's Motion to Dismiss Pursuant to Rule 12(b)(6)	0.80
4/15/2020	Appear and attend Rule 16 Scheduling Conference by telephone	0.50
4/15/2020	Receipt and review of Case Management Order, enter all dates	0.40
4/15/2020	Telephone conference with nursing and corrections expert, Valerie Tennesen, RN	0.60
4/16/2020	Continue drafting Motion and Brief in Response to Corizon Defendants' 12(b)(6) Motion to Dismiss - all sections	5.70
4/19/2020	Begin drafting First Set of Request for Production of Documents to Corizon Health, Inc.	0.70
4/20/2020	Receipt and review Appearance by Devlin Scarber on behalf of the Corizon Defendants	0.10
4/22/2020	Receipt and review of default and impending dismissals/show cause for Kent County Defendants McGinnis and Houston	0.20
4/22/2020	Email to Atty Tim Eagle inquiring if he was answering on behalf of Def. McGinnis	0.20
4/22/2020	Finalized Motion and Brief in Response to Corizon Defendants' Motion to Dismiss, compiled exhibits, scanned and uploaded for filing on ECF system	3.10
4/23/2020	Filed Motion Response, Brief in Response and Exhibits - to Defendants' Rule 12(b)(6) Motion (Dk#: 42)	0.30
4/23/2020	Receipt and review Defendant McGinnis' Answer to Complaint, Affirmative Defenses and Jury Demand	0.10
4/23/2020	Filed corrected response after receiving notice about exhibits from ECF clerk	0.10
4/24/2020	Finalized and served Plaintiff's Rule 26(a) Initial Disclosures on Kent County Defendants	1.10
4/27/2020	Draft Supplemental Response to Defendants' Rule 12(b)(6) Motion to Dismiss (Request for Oral Argument only)*	0.20
4/27/2020	File Supplemental Response to Defendant's Motion (Request for Oral Argument only)	0.10
4/28/2020	Conduct search online for Defendant, Anthony (Tony) Houston, in Texas and Arizona to effectuate service of process	0.60
4/29/2020	Contact Sheriff Constable in Hayes County, AZ to effectuate Service on Defendant Houston	0.30
5/1/2020	Telephone call with Sheriff Constable re: fee to service Tony Houston in Arizona	0.20
5/2/2020	Begin drafting Plaintiff's First Set of Interrogatories to Defendant, Corizon Health, Inc. and Revise First Request for Production to Corizon.	3.40
5/5/2020	Email from Hayes County Sheriff Constable re: time frame to serve Defendant Houston	0.10
5/5/2020	Draft and file Response to Court's Petition re: Status of Service on Defendant Houston	0.70
5/5/2020	Receipt and review of Reply in Support of Corizon Defendants' Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6)	1.10
5/6/2020	Draft and file Motion for Extension of Time to Effectuate Service on Defendant Houston	1.20
5/6/2020	Receipt and Review Order Granting Plaintiff's Motion for Extension of Time to Effectuate Service on Def. Houston	0.10
5/7/2020	Begin drafting Plaintiff's First Set of Interrogatories and Request for Production to Kent County	4.80
5/8/2020	Continue drafting Plaintiff's First Set of Interrogatories to Corizon Health, Inc.	2.60
5/8/2020	Email R. Chapman Plaintiff's First Set of Interrogatories and Request for Production of Documents to Def. Corizon Health, Inc.	0.20
5/11/2020	Continue drafting first set of Interrogatories and Request for Production of Documents to Def. Kent County	1.10
5/12/2020	Serve First Set of Interrogatories and Request for Production of Documents on Def. Kent County via email	0.20
5/14/2020	Email Corizon Counsel Plaintiff's Rule 26 Disclosures and Plaintiff's Spectrum Health Records	0.20
5/15/2020	Email from R. Chapman's office requesting Pl.'s discovery in word format, sent in word	0.10
5/15/2020	Add in import details to Timeline of Events	1.50

5/15/2020	Receipt and review of certificates of services for Kent County and Corizon Defendants	0.10
5/15/2020	Receipt and review of Corizon Defendants' Rule 26 Initial Disclosures, including one page Declaration Sheet from Insurance Policy Only	0.40
5/15/2020	Receipt and review of Kent County Defendants' Rule 26 Disclosures	0.30
5/15/2020	Email to R. Chapman and D. Scarber requesting full insurance policy per Rule 26	0.20
5/26/2020	Receipt and review of unexecuted summons re: Def. Houston	0.10
5/26/2020	Email to Hayes County Constable re: status of service of process on Houston	0.10
5/26/2020	Obtained Waiver of Service for Houston, filed with Court	0.10
5/26/2020	Second Email to R. Chapman and D. Scarber requesting copy of complete insurance policy in accordance with Rule 26	0.10
5/28/2020	Review and receipt of Affidavits of Meritorious Defense from Defendants, Byrne, Steimel, Furnace, Mollo, Fielstra, Card, Goetterman, Sherwood and Navarro	0.90
5/28/2020	Third email to R. Chapman and D. Scarber requesting copy of full insurance policy in accordance with Rule 26	0.20
6/1/2020	Fourth email to R. Chapman and D. Scarber requesting full policy, will be filing motion to compel and seeking sanctions under Rule 37.	0.20
6/3/2020	Email response from D. Scarber stating that Lone Star Policy is the only policy and Dec Page is compliance with Rule 26	0.10
6/5/2020	Research case law and Rules 26 and 37, in preparation for drafting Motion to Compel Insurance Agreement from Corizon Defendants and Brief in Support	3.70
6/6/2020	Draft Motion to Compel Insurance Agreement and Brief in Support, Compile Exhibits	4.50
6/8/2020	Finalize Motion to Compel Insurance Agreement and Brief in Support, Compile Exhibits, upload and file with Court	3.60
6/9/2020	Receipt and review Corizon Defendants' Answers and Objections to Plaintiff's First Set of Interrogatories and Requests for Production of Documents	2.20
6/10/2020	Review Corizon Policies & Procedures produced in discovery; produced Corizon's prison policies, not jail policies	0.60
6/11/2020	Receipt and review of Defendant Kent County's Answers and Objections to Plaintiff's First Set of Interrogatories and Request for Production of Documents	3.40
6/12/2020	Email to R. Chapman and D. Scarber re: requesting supplemental responses to Pl.'s discovery, and jail policies	0.40
6/12/2020	Researched caselaw re: discovery proportionality, burdensome, cost shifting factors under Rule 26	1.80
6/13/2020	Email to D. Scarber (3-pages) outlining specific deficiencies in discovery responses and request for supplemental responses	1.60
6/16/2020	Receipt, review, summarized Corizon's Response to Kent County's Request for Proposals (Bid) for Healthcare Services in the Kent County Jail (7/13/13 - contract extended through DOL) and Contract Documents (including 12/8/16 amendment)	3.70
6/21/2021	Telephone conference with Dan. J Fintel, M.D., expert	1.00
6/22/2020	Receipt and review of Corizon Defendants' Response to Pl.'s Motion to Compel Insurance Agreement	1.00
6/24/2020	Detailed Letter to D. Scarber re: Request for Supplement Responses to Pl.'s Interrogatories and Request for Production of Documents (21 pages)	2.90
7/2/2020	Receipt and review of Certificate of Service of Corizon Defs' First Set of Request for Admissions, Interrogatories, and Requests for Production of Documents on Plaintiff	0.10
7/2/2020	Receipt and review of Corizon Defs' First Set of Request for Admissions, Interrogatories and Requests for Production on Plaintiff.	0.70
7/7/2020	Receipt and Review of Order to Compel Production of Insurance Agreement and Award of Sanctions against Corizon Health, Inc.	0.30
7/8/2020	Telephone call with D. Scarber re: sanctions and production of insurance agreement, stipulation to \$1,200, Pl. will not collect.	0.20

7/13/2020	Draft proposed Stipulation and Order for Discovery Sanctions against Corizon	0.20
7/13/2020	File proposed Stipulation and Order for Discovery Sanctions against Corizon	0.10
7/13/2020	Receipt and review of Order awarding sanctions against Corizon	0.10
7/17/2020	Receipt and review of Def. Corizon's full insurance policies - Lone Star (\$ 2M SIR) and Scottsdale (\$10M excess)	0.50
7/17/2020	Draft Pl.'s Responses to Corizon Defs' Discovery	3.40
7/20/2020	Letter from Atty Tim Eagle with Copy of Jail Surveillance Video on external hard drive	0.10
7/20/2020	Detailed Letter to Tim Eagle re: supplemental answers to discovery (5-pages)	1.30
7/21/2020	Continue drafting responses to Corizon Defs' discovery to Plaintiff	1.50
7/23/2020	Receipt and review of Answer to Complaint, Affirmative Defenses and Reliance upon Jury Demand for Def. Houston	0.10
7/24/2020	Email to Atty R. Chapman, D. Scarber and T. Eagle re: still do not have supplemental responses to discovery, concerned about lack of progress in this case, agreement to discontinue Angela Navarro and scheduling of Kent County and Corizon employee depositions	0.60
7/24/2020	Revise Timeline of Events	1.20
7/25/2020	Finalize Responses to Corizon Defs' Discovery, send to client to review and for approval	2.30
7/28/2020	Serve Pl.'s Answer to Corizon's Defs' First set of Requests for Admissions, Interrogatories and Requests for Production of Documents	0.20
7/29/2020	Email to defense attorneys re: stipulating to first adjournment of case management order	0.20
7/31/2020	Receipt and review of Stipulation and Proposed Order for First Amendment to Case Management Order (CMO)	0.20
8/3/2020	Receipt and review of Order for First Amendment to CMO	0.10
8/4/2020	Email to D. Scarber re: giving final deadline of August 7, 2020 for Supplement Responses to discovery that Pl. has been asking for since 6/15/2020	0.30
8/5/2020	Email from D. Scarber agreeing to supplement by Friday, 8/5/2020	0.10
8/10/2020	Receipt, review and Bates stamped Corizon Defs' Supplemental Responses to Pl's First Interrogatories and Request for Production, including Attachments A through K and 8 employment files (Produced 3345 pages of documents)(Bates CH000001-003345)	6.70
8/11/2020	Made 4 copies of all documents contained in Attachments A through K, put in binders to use for depositions (for witnesses and for opposing counsel during depositions) (A through K = 1154 pages x 4 = 4616 copies)	3.20
8/12/2020	Complied documents and sent responses and all attachments to Pl's experts via electronic link.	0.40
8/15/2020	Receipt and Review of Magistrate's Report and Recommendation Granting in Part and Denying in Part, Corizon Defendants' Motion to Dismiss	0.50
8/20/20	Revised and updated Timeline of Events, added in specific policies and procedures for Kent County and Corizon	1.50
8/20/20	Review file and documents in preparation for depositions of Kent County employees, Kraai, Hirdes, Vitale, Jimenez	2.10
8/20/2020	Reviewed the NCCHC 2014 Standards for Jails	2.20
8/21/2020	Prepare for depositions of Kent County Employees, Koetsier, Barda	0.60
8/26/2020	Attend and take deposition of Chris Barda	0.80
8/26/2020	Attend and take deposition of Natasha Hirdes	1.80
8/27/2020	Attend and take deposition of Nicholas Jimenez	1.80
8/27/2020	Attend and take deposition of Todd Koetsier	0.20
8/27/2020	Attend and take deposition of Brian Vitale	0.50

8/27/2020	Attend and take deposition of Jonathan Kraai	0.40
8/28/2020	Receipt and review Corizon Defendants' Objections to Magistrate's Report and Recommendation Re: Motion to Dismiss	1.20
8/28/2020	Review of Corizon's NCCHC Accreditation Reports	0.60
8/28/2020	Receipt and review appearance of Peter Smit for Kent County Defendants	0.10
9/8/2020	Telephone conference with Stephen Furnman, RN (expert) to discuss case	0.50
9/9/2020	Review and summarize Attachment "C" - Site Specifics - Policies & Procedures for Kent County and compare with corporate policies	3.70
9/10/2020	Continue reviewing Corizon's Policies & Procedures, Core Processes, and all documents produced to date, including employment files, in preparation for depositions of employees	3.50
9/11/2020	Draft Second Request for Production of Documents to Kent County	1.80
9/12/2020	Draft Second Request for Production of Documents to Corizon Defendants	1.20
9/14/2020	Revise and finalize Second Request for Request for Production of Documents to Kent County	0.40
9/14/2020	Revise and finalize Second Request for Request for Production of Documents to Corizon Defendants	0.30
9/22/2020	Emails with defense attorneys re: Stipulation and Order for Second Adjournment of CMO	0.20
9/22/2020	Draft Proposed Stipulation and Order for Second Amendment to CMO	0.40
9/22/2020	File Stipulation and Order for Second Amendment to CMO	0.10
9/23/2020	Prepare Rule 26(a)(2)(A) Expert Disclosures	1.80
9/25/2020	Receipt and Review of Order for Second Amended CMO	0.10
9/27/2020	Continue preparing Rule 26(a)(2)(A) Expert Disclosures	1.00
9/28/2020	Email to Tim Eagle re: Pl.'s proposed Rule 30(b)(6) deposition notice with topics and specifically areas per new amendments to rule	0.20
9/28/2020	Receipt and review of Notice of Reassignment to Hon. Hala Y. Jarbou	0.10
10/1/2020	Review Defendant Goetterman's discipline filing with LARA, license suspension, consent order, etc. . .	0.40
10/8/2020	Telephone conference with Valerie Tennesen, RN (Corrections and Nursing expert)	0.40
10/10/2020	Prepare for depositions of Corizon defendants, Fielstra, Steimel, Byrne and Card	7.90
10/11/2020	Prepare for depositions of Corizon Employees, Yacob, Mollo, Sherwood, Furnace	8.00
10/11/2020	Prepare for depositions of C. Pearson and N. Yacob	1.60
10/12/2020	Attend and take deposition of Teri Byrne, RN	1.50
10/12/2020	Attend and take the deposition of Christopher Pearson	1.30
10/13/2020	Attend and take deposition of Janice Steimel, LPN	2.50
10/13/2020	Attend and take deposition of Lynne Fielstra, LPN	2.40
10/14/2020	Attend and take the deposition of Dr. Nasir Yacob	3.40
10/14/2020	Attend and take deposition of James Mollo, LPN	1.90
10/15/2020	Attend and take deposition Dan Card, LPN	2.50
10/15/2020	Attend and take the deposition of Melissa Furnace, RN	3.60
10/16/2020	Receipt, reviewed and Bates stamped Corizon Defendants' Response to Pl.'s Second Request for Production of Documents (With Attachments L through V) (Bates Nos. CH003346-CH4665)	3.20

10/16/2020	Made 4 copies of Attachments L through V for deposition exhibits, copies for exhibit binder, witness and defense counsel to be used at depositions (1319 pages x 4 = 5,276 copies)	2.80
10/17/2020	Prepare for deposition for Corizon Employee, Chad Goetterman	1.60
10/24/2020	Emails all counsel with Exhibits 1-64 from all depositions taken today, scanned all exhibits, maintained list and keeper of all original exhibits.	1.60
10/28/2020	Filed Rule 26(a)(2)(A) Expert Disclosures	0.10
11/2/2020	Draft Rule 30(b)(6) deposition notice for Corizon	2.10
11/4/2020	Continue drafting 30(b)(6) notice for Corizon	0.20
11/5/2020	Prepare for depositions of Kent County employees	3.20
11/6/2020	Prepare deposition outline for Chad Goetterman	2.70
11/7/2020	Prepare for deposition of Alice Clevenger	2.50
11/9/2020	Attend and take Deposition of Sergeant Knott	1.50
11/9/2020	Attend and take deposition of Sgt. Julie Cooper	1.70
11/9/2020	Attend and take the deposition of sgt. Rebecca McGinnis	0.70
11/11/2020	Attend and take the deposition of Alice Clevenger	2.70
11/13/2020	Attend and take deposition of Chad Goetterman	4.70
11/13/2020	Receipt and review of Kent County Defendants' Rule 26(a)(2)(A) Expert Disclosures	0.20
11/14/2020	Receipt and review of Corizon Defs' Rule 26(a)(2)(A) Expert Disclosures	0.20
11/18/2020	Draft and serve 3rd Request for Production of Documents to Kent County	1.60
11/24/2020	Email to D. Scarber re: Pl's 30(b)(6) Deposition Notice to Corizon, list of Specific Topic and request to confer per new rules.	0.30
12/1/2020	Email from R. Chapman re: apology for not getting back sooner about Rule 30(b)(6) deposition notice	0.10
12/2/2020	Served 30(b)(6) Deposition Notice on Counsel for Corizon	0.10
12/3/2020	Attend and take deposition of Bryan Clark	1.60
12/7/2020	Receipt and review of Corizon Defendants' Answer to Complaint, Affirmative Defenses and Jury Demand.	0.60
12/15/2020	Receipt and review of WAde Jones' college transcripts and records	0.30
12/16/2020	Receipt, reviewed and Bates stamped Corizon Defendants' Amended Answers to Pl.'s Second Request for Production of Documents (Attachments X through AA) (CH004674-CH5113)	1.10
12/16/2020	Made 4 copies of attachments for depositions exhibits, exhibit binder for witness during depositions, and copies for defense counsel (439 pages x 4 = 1,756 copies)	0.60
12/18/2020	Receipt and review of Kent County's Response to Pl.'s Third Requests for Production of Documents	1.20
12/21/2020	Attend and take the deposition of Penny Johnson, H.S.A.	3.30
12/21/2020	Attend and take deposition of Corizon 30(b)(6) Corporate Designee	3.00
12/24/2020	Serve Pl.'s Request for Production of Documents and Request for Entry onto Land for Inspection to Corizon, dated 12/24/2020	2.00
12/24/2020	Draft and send preservation of evidence letter to D. Scarber and R. Chapman after 30(b)(6) Dep and Corizon losing contract at Kent County without notifying Pl.	2.60
1/3/2021	Summary of Penny Johnson, HSA and Penny Johnson as corporate designee, deposition testimony	2.70
1/6/2021	Attend and take the deposition of Kent County Rule 30(b)(6) Corporate Designee, C. Fennema	1.50

1/6/2021	Attend and take the deposition of Kent County Rule 30(b)(6) Corporate Designee, D. Moore-Brown	0.80
1/6/2021	Attend and take the deposition of Kent County Rule 30(b)(6) Corporate Designee, B. Piebenga	1.30
1/6/2021	Attend and take the deposition of Kent County Rule 30(b)(6) Corporate Designee, D. Kok	0.30
1/6/2021	Attend and take the deposition of Kent County Rule 30(b)(6) Corporate Designee, C. White	0.40
1/7/2021	Attend and take deposition of Christ Bogner	1.96
1/7/2021	Attend and take deposition of William Grimmert	1.78
1/8/2020	Attend and take deposition of Michelle Lajoie-Young	1.36
1/8/2021	Attend and take deposition of Klint Thorne	1.06
1/8/2021	Attend and take deposition of Lt. Emily Kalman	4.00
1/8/2021	Receipt and review correspondence from T. Eagle re: supplemental discovery responses	0.10
1/11/2021	Attend and take the deposition of William Jourden	2.30
1/11/2021	Attend and take deposition of Tony Houston	0.80
1/12/2021	Attend and take the deposition of Donald Plugge	1.80
1/14/2021	Revisions to Corizon Defendants' proposed. Qualified Protective Order re: ex parte communications with treating physicians	0.40
1/14/2021	Receipt and review of notice of depositions for Charles, Brian, Janice Jones and Jennifer Tofferi	0.20
1/16/2021	Email to D. Scarber and R. Chapman re: providing dates for mediation with Bill Jack	0.20
1/21/2021	Receipt, review and Bates stamp Corizon Defendants' Response to Pl.'s Request for Production of Documents and Request for Entry onto Land for Inspection dated 12/24/20 (CH005144- CH009582)	4.40
1/21/2021	Make 4 copies of all documents produced in response by Corizon, for Exhibit binder to be used in depositions, by witnesses in depositions and copies for defense counsel during depositions. (4438 pages x 4 = 17,752 copies)	3.20
1/22/2021	Receipt and review of Kent County's Response to Pl.'s Request for Entry onto Land for Inspection	0.30
1/27/2021	Draft letter to client re: facilitation process and confirmation of date	0.20
2/2/2021	Prepare summaries of Corizon Defendants deposition testimony in preparation for Motion for Summary Judgment Response	4.70
2/4/2021	Continue drafting line-by-line summaries of Corizon employees' testimony in preparation for drafting response to Motion for Summary Judgment	3.70
2/8/2021	Attend and defend deposition of Janice Jones	2.90
2/8/2021	Attend and defend deposition of Charles Jones	2.40
2/9/2021	Attend Inspection of the Kent County Correctional Facility	2.00
2/9/2021	Attend and defend deposition of Jennifer Tofferi	2.00
2/9/2021	Attend and defend deposition of Brian Jones	1.00
2/10/2021	Draft deposition summaries of family witnesses	2.20
2/11/2021	Conference with Valerie Tennesen, expert re: report and expert disclosures	0.60
2/11/2021	Conference with S. Furman, expert re: report and disclosures	0.40
2/13/2021	Conference with McMunn, expert re: report and disclosures	0.30
2/17/2021	Attend and defend deposition of Jennifer Razzoog	0.40
2/18/2021	Prepared expert disclosure packages	0.70
2/18/2021	Emailed Rule 26(a)(2)(B) Expert Disclosures to Defendants	0.10

2/21/2021	Drafting Supplemental Initial Disclosures	0.50
2/25/2021	Finalized and served Supplemental Initial Disclosures	0.30
2/26/2021	Receipt and review of Facilitation Agreement from Bill Jack	0.30
2/26/2021	Receipt, review and summarize certified copy of Metro Health Records (complete copy)	1.20
2/27/2021	Review file in preparation for drafting facilitation summary	3.60
2/28/2021	Begin drafting facilitation summary	4.30
3/1/2021	Continue drafting facilitation summary	2.60
3/5/2021	Completed facilitation summary and compiled exhibits (1 - 34)	3.20
3/8/2021	Emailled facilitation summary to Bill Jack	0.10
3/10/2021	Receipt and review of Kent County's Facilitation Summary	1.10
3/11/2021	Receipt and review of Corizon Defendants' Facilitation Summary	1.40
3/15/2021	Attend Facilitation Hearing in Grand Rapids (Bill Jack)	3.50
3/17/2021	Receipt and review correspondence from Bill Jack re: report of voluntary mediation	0.10
3/19/2021	Receipt and review of Corizon Defs' Rule 26(a)(2)(B) Expert Disclosures and reports from E. Journey, B. Williamson, C. Hadden, M. Migaud, and K. Pearson	2.80
3/22/2021	Drafted Stipulation and Proposed Order re: high damage caps on medical malpractice claim	0.30
3/22/2021	Email to R Chapman - Stip & Proposed Order re: high damages cap to Corizon Counsel	0.10
3/22/2021	Email to R. Chapman re: inquiring about additional depositions of Corizon employees	0.20
3/22/2021	Receipt and review letter from T. Eagle with report of corrections expert, Thomas Shull, reviewed report	0.30
3/29/2021	Receipt and review of Corizon Defs' Second Request for Production of Documents to Pl. and their First Request for Production to Defendant Kent County	0.30
3/29/2021	Receipt and review of Subpoena from Corizon to Montcalm County requesting jail records for decedent	0.10
3/30/2021	Email to counsel re: depositions of Corizon employees Baleski and Tunnell	0.10
3/29/2021	Email to T. Eagle re: County's jail call logs, and other documents produced by County	0.20
3/29/2021	Email to Client with Corizon's Second Request for Production and request for signed authorizations	0.10
4/7/2021	Prepare for depositions of H. Tunnell and K. Orent	0.80
4/8/2021	Attend and take the deposition of Heather Tunnell	2.00
4/8/2021	Attend and take the deposition of Kimberly Orent	0.90
4/8/2021	Compile exhibits fro depositions of J. Teunis and T. Baleski	0.40
4/20/2021	Prepare for depositions of J. Teunis and R. Baleski	0.60
4/21/2021	Attend and take the deposition of Julienne Teunis	0.30
4/21/2021	Attend and take the deposition of Robin Baleski	1.00
4/22/2021	Receipt and review of Third Amended Case Management Order	0.10
4/26/2021	Prepare Response to Corizon Defs' Second Request for Production - compile documents	1.30
4/26/2021	Finalize and service Response to Corizon Defs' Second Request for Production of Documents	0.40
4/26/2021	Review Stipulation and Proposed Order to Dismiss Kent County Defs., Stelma, Kok, Bogner, Thorne, Houston and Clark only	0.30

4/28/2021	Receipt review true copy of Order of Dismissal of Stelma, Kok, Bogner, Thorne, Houston and Clark, only.	0.10
5/7/2021	Email D. Scarber re: subpoenas and review of employee training records	0.20
5/11/2021	Receipt and review of Montcalm County Jail Records	0.40
5/11/2021	Receipt and review of no record statement for Mecosta County jail records	0.10
5/13/2021	Attend review of employee training records at Chapman Law Group in Troy, MI	2.30
5/14/2021	Review and summarize health and staff training documents copied from 5/13/2021 inspection	2.00
5/26/2021	Research caselaw and drafted memorandum of law re: Daubert challenges for impending motions	3.70
5/27/2021	Receipt and review of Kent County's Response to Corizon Defs' Request for Production of Documents, including John Cooper's work schedule, identity of deputies working in infirmary, deputies work schedules, relief deputy work schedules.	0.20
6/10/2021	Email to R. Chapman re: dates for expert depositions	0.10
6/16/2021	Review of Disclosures of K. Pearson, RN, expert in preparation for Daubert challenge	0.70
6/16/2021	Review of Disclosures of Edward Journey, D.O., expert in addiction medicine, including article "Predictors for Severe Alcohol Withdrawal" in preparation for Daubert challenge	1.10
6/16/2021	Review of Disclosures of Brian Williamson, M.D., expert in cardiology, including prior testimony, in preparation for Daubert challenge	0.80
6/21/2021	Review file in preparation for deposition of Pl.'s expert cardiologist, Dan J. Fintel, M.D., make two copies of his file, report and disclosures for defense counsel	3.10
6/22/2021	Fly to Chicago, pre-deposition conference Pl.'s expert cardiologist, Dan J. Fintel, M.D.	7.50
6/22/2021	Attend and defend deposition of Dr. Dan J. Fintel, M.D.	2.50
6/23/2021	Fly back to Detroit from Chicago from Dr. Fintel's deposition	5.00
7/5/2021	Prepare for deposition of Stephen Furman, RN, Pl.'s Nursing Expert, make 2 copies of his file, report and disclosures for defense counsel	4.10
7/7/2021	Fly to Richmond, VA for Deposition of Stephen Furman, RN, Pl.'s Nursing Expert, attend pre-deposition conference with Nurse Furman	9.00
7/8/2021	Attend and defend deposition of Stephen Furman, RN	4.80
7/8/2021	Fly back to Detroit from Richmond, VA after Nurse Furman's deposition	6.00
7/11/2021	Prepare for deposition of Michael McMunn, Pl.'s Nurse Practitioner expert, compile records and make copies for defense counsel	3.50
7/13/2021	Fly to Atlanta for deposition of Michael McMunn, N.P., Pl.'s expert	6.00
7/14/2021	Attend pre-deposition conference with Michael McMunn, N.P.	1.00
7/14/2021	Attend and defend deposition of Michael McMunn, N.P., Pl.'s expert	4.00
7/14/2021	Fly back to Detroit from Atlanta after deposition of Michael McMunn, N.P.	6.00
8/3/2021	Prepare for deposition of Valerie Tennesen, R.N., Pl.'s correctional nursing expert, make 2 copies of file and disclosures defense counsel	2.20
8/3/2021	Prepare for deposition of Ronald Nelson, Pl.'s correctional policies and procedures expert, make copies of file and expert disclosures	1.50
8/4/2021	Fly to Los Angeles for depositions of Pl.'s corrections/nursing and correctional policies and procedures experts, Valerie Tennesen, R.N., and Ronald Nelson	8.00
8/4/2021	Attend pre-deposition conference with Valerie Tennesen, R.N. In Camarillo, CA	2.50
8/5/2021	Appear and defend deposition of Valerie Tennesen, R.N., Pl.'s expert	3.70
8/5/2021	Attend pre-deposition conference with Ronald Nelson, Pl.'s correctional policies and procedures.	1.10
8/6/2021	Appear and defend deposition of Ronald Nelson	3.00

8/6/2021	Fly back to Detroit from Los Angeles after depositions of Valerie Tennesen, R.N. And Ronald Nelson	8.00
8/9/2021	Review report and disclosures in preparation for deposition of Cynthia Hadden, R.N., Corizon's expert; prepare outline	3.30
8/10/2021	Appear and take deposition of Corizon's expert, Cynthia Hadden, R.N.	4.80
8/19/2021	Prepare for deposition of Edward Journey, D.O., review article relied upon by Jouney, studies re: stages of liver disease, Kent County ME file and Metro Health Records; prepare examination outline	2.70
8/20/2021	Appear and take deposition of Edward Journey, D.O., Corizon's expert, addiction medicine	2.50
8/24/2021	Receipt and review deposition transcripts of Valerie Tennesen and Ronald Nelson	1.10
8/25/2021	Receipt and review deposition transcript of Cynthia Hadden, R.N.	0.60
9/8/2021	Review report, prior testimony, prior depositions, work history of Corizon's expert Kimberly Pearson, R.N. In preparation for deposition	3.40
9/8/2021	Receipt and review deposition transcript of Edward Journey, D.O.	2.20
9/8/2021	Create list of Exhibits from Depositions	1.30
9/9/2021	Appear and take deposition of Kimberly Pearson, R.N.	4.00
9/10/2021	Receipt and review deposition transcript of Michael McMunn, N.P.	1.10
9/27/2021	Receipt and review deposition transcript of Kimberly Pearson, RN	1.00
9/28/2021	Receipt and review of Kent County Defendants' Motion for Summary Judgment and Brief in Support, with exhibits	2.10
9/28/2021	Receipt and review of Corizon Defendants' Motion for Summary Judgment and Brief in Support, with exhibits	2.30
9/28/2021	Receipt and review of Order of Dismissal of Kent County employee, Rebecca McGinnis, only	0.10
9/30/2021	Research caselaw re: deliberate indifference, objective and subjective components, specific findings of DI where each defendant made the connection between the serious medical condition and conduct increasing risk of harm	3.70
10/1/2021	Research caselaw re: qualified immunity, specific cases that are similar to facts in instant case putting Defendants on notice of unconstitutional behavior	2.30
10/2/2021	Prepare format for MSJ Responses for both Defendants, and draft table of contents, issues presented, index of authorities, controlling authority sections	6.50
10/2/2021	Review deposition transcripts of all witnesses and experts in preparation for drafting responses to Defendants' (both Corizon and Kent) Motions for Summary Judgment	4.40
10/3/2021	Begin drafting response briefs to both motions for summary judgment	8.00
10/4/2021	Draft Pl.'s Ex-Parte Motion to Exceed Word Limit for Response to Corizon Defendants' MSJ	1.00
10/4/2021	Continue drafting responses to both Defendants' Summary Judgment Motions and Briefs in Response	10.50
10/6/2021	Receipt and review of Order granting Pl's Motion to Exceed Word Limit for Corizon Defendants' MSJ Response	0.10
10/7/2021	Continue drafting responses to both Defendants' Summary Judgment Motions and Briefs in Response, Introduction, counter-statement of facts and standard of review sections (for both motions)	12.00
10/8/2021	Continue drafting responses to Corizon Defendants' Summary Judgment Motions, intoxication defense, Monell claims	12.00
10/9/2021	Continue drafting responses to both Defendants' Summary Judgment Motions and Briefs in Response	10.00
10/13/2021	Edited jail video to create exhibit in response to both Defendants' Motions for Summary Judgment (identified 20 separate video from 520 hours of surveillance video)	4.80
10/14/2021	Continued to edit jail video to create MSJ Response exhibit, drafted Exhibit "7" Table of Contents to all video "clips" (7.a - 7.O.)	5.70

10/15/2021	Continued drafting argument sections to Corizon's Motion for Summary Judgment, specific conduct as to each defendant	10.90
10/16/2021	Began compiling exhibits in support of response to both Defendants' Motions for Summary Judgment	6.50
10/20/2021	Continued compiling exhibits in support of both Defendants' Motions for Summary Judgment, redacting personal information and highlighting deposition testimony	4.20
10/21/2021	Finalized Motion and Brief in Response to Defendant Kent County's MSI, uploaded exhibits (22), in preparation for e-filing, drafted certificate of word count	3.70
10/22/2021	Filed Pl's Response and Brief in Response to Def. Kent County's Motion for Summary Judgment (ECF No. 135)	0.40
10/22/2021	Continued drafting argument sections to Corizon's Motion for Summary Judgment, specific conduct as to each defendant, monell claims, intoxication defense, compiled exhibits (21) in preparation for e-filing	7.80
10/24/2021	Finalized Response and Brief in Response to Corizon Defs' Motion for Summary Judgment and drafted certificate or word count compliance	3.10
10/25/2021	Filed Pl's Response and Brief in Response to Corizon Defs' Motion for Summary Judgment (ECF No. 136)	0.50
11/8/2021	Receipt and review of Def. Kent County's Reply Brief in Support of Motion for Summary Judgment (ECF No. 137)	0.90
11/9/2021	Receipt and review of Corizon Defs' Reply Brief in Support of Motion for Summary Judgment (ECf No. 138)	1.10
1/26/2022	Email to D. Scarber re: Adjourning CMO until decisions on Motions for Summary Judgment	0.20
1/26/2022	Draft Stipulation and Proposed Order for Fourth Amendment to Case Management Order	0.30
1/28/2022	Receipt and review of Order for Fifth Amended CMO	0.10
4/14/2022	Receipt and review Order for Settlement Conference for May 9, 2022	0.10
4/15/2022	Draft stipulation and Proposed Order for Sixth Amendment to Case Management Order	0.20
4/21/2022	Receipt and review of Order granting Sixth Amended CMO	0.10
4/22/2022	Draft letter to client re: new trial date and settlement conference	0.20
4/22/2022	Draft and email letter to R. Chapman and D. Scarber re: demand for settlement	0.60
4/22/2022	Draft and email letter to T. Eagle and P. Smit re: demand for settlement	0.20
4/29/2022	Receipt and review of Order and Opinion re: Motions for Summary Judgment (ECF No. 125 and 126) (55-pages)	1.10
5/2/2022	Receipt and review of proposed Stipulation and Order of Def. Bryan Knott	0.10
5/4/2022	Draft confidential settlement letter to Magistrate Sally Berens	1.10
5/6/2022	Review Judge Jarbou's Trial Practice Guidelines	0.20
5/5/2022	Begin drafting Motions in Limine - Daubert Challenge to Kimberly Pearson and Exclusion of 4 categories of evidence	3.40
5/8/2022	Conference with Client in preparation for settlement conference	1.20
5/9/2022	Appear and attend settlement conference (via Zoom) with Magistrate Berens	2.00
5/16/2022	Email to R. Chapman and D. Scarber re: limits of insurance coverage based upon representations at Settlement Conference.	0.50
5/16/2022	Email from D. Scarber re: stating that they have reached out to their client to clarify insurance limits and issues with policies	0.20
5/23/2022	Receipt, review and summarize of Corizon's "Master" Insurance policy and Scottsdale Valitas Policy.	2.20
6/2/2022	Continue drafting motions in limine - Motion to exclude SOC testimony of Pearson, to exclude evidence of prior arrests or convictions, dismissal of economic claims, failure or inability to produce tax returns and ultimate legal conclusions	3.60
6/5/2022	Email to D. Scarber and R. Chapman advising what motions in limine Pl. will be filing	0.20
6/27/2022	Draft proposed Stipulation and Order for Seventh Amended CMO	0.20

6/28/2022	Receipt and review of Order denying Order for Seventh Amended CMO	0.10
6/28/2022	Finalized Motion in Limine and Brief in Support to Exclude Testimony and Evidence at Trial (Crimes, taxes, economic claims, and ultimate conclusions)	3.16
6/28/2022	Finalized Motion in Limine and Brief in Support to Exclude Kimberly Pearson, RN from Testifying at Trial, compiled exhibits for e-filing	4.30
6/30/2022	Filed Motion in Limine and Brief in Support to Exclude Kimberly Pearson, RN from Testifying at Trial (ECF No. 154)	0.30
6/30/2022	Filed Motion in Limine and Brief in Support to Exclude Testimony and Evidence at Trial (ECF No. 155)	0.20
6/30/2022	Receipt and review Corizon Defs' Motion (and Brief) in Limine to Preclude Reference to Corizon Policies & Procedures at Trial	0.70
6/30/2022	Receipt and review of Corizon Defs' Motion (and Brief) in Limine to Preclude Reference to the Prior Complaint against Goetterman	0.60
6/30/2022	Receipt and review of Corizon Defs' Motion (and Brief) in Limine to Preclude Reference to training and employment records	0.50
6/30/2022	Receipt and review of Corizon Defs' Motion in Limine to Preclude Reference to Decedent Detoxing	0.50
6/30/2022	Receipt and review of Corizon Defs' Motion in Limine to Limit Plaintiff's Damages to Survival Damages	0.70
6/30/2022	Receipt and review of Corizon Defs' Motion in Limine to Preclude Plaintiff's Expert Stephen Furman, RN from Testifying	1.10
7/1/2022	Begin drafting responses to Defendants' Motions in Limine	3.50
7/3/2022	Draft Response and Brief in Response to Defendants' Motion in Limine to Exclude Stephen Furman, RN	4.70
7/3/2022	Draft Affidavit for Stephen Furman, RN in support of motion response	0.30
7/6/2022	Draft Response to Defendants' Motion to Preclude Reference to Survival Damages and request for sanctions	6.30
7/9/2022	Draft Response to Defendants' Motion to Preclude Reference to 1) Decedent detoxing prior to 1:00 a.m. in 4/26/18, 2) Corizon at trial as irrelevant, 3) and Corizon P&P as irrelevant	7.20
7/11/2022	Draft Response to Defendants' Motion to Preclude Reference to: 1) Defendants' training records, and 2) the prior complaint against Goetterman	2.50
7/12/2022	Begin preparing Joint Final Pretrial Order, joint statement of case	3.80
7/13/2022	Finalize Responses to Defendants' Motions in Limine, prepare exhibits, upload for e-filing	4.70
7/13/2022	Begin drafting pretrial submissions, trial brief, voir dire, compiling jury instructions and proposed verdict form	5.50
7/14/2022	Receipt and review of Order extending deadline for pretrial filings	0.10
7/14/2022	Receipt and review Defendants' Response to Pl.'s MIL to Exclude Testimony of Kimberly Pearson	0.30
7/14/2022	Receipt and review of Defendants' Response to Pl.'s MIL to Exclude Testimony and Evidence at Trial (Crimes, taxes, economic claims and ultimate issues	0.50
7/15/2022	Conference (via Zoom) with R. Chapman and D. Scarber to discuss JFPTO, jury instructions and verdict form	2.00
7/15/2022	Begin compiling exhibits for trial exhibit binders (65 exhibits, tabbed and 6 binders)	2.90
7/15/2022	E-file Responses to Defendants' Motions in Limine (ECF Nos. 164, 165, 166 and 167)	0.80
7/16/2022	Continue compiling and assembling trial exhibit binders, JFPTO, jury instruction, voir dire, trial brief, verdict form, joint statement of case/elements due 7/18/22	7.50
7/16/2022	Drafted and filed Pl.'s Corrected Response to Defendants' MIL to Preclude Reference to Corizon at Trial, et al (ECF No. 157)	0.30
7/17/2022	Continued working on pretrial submissions, jury instructions, verdict form, voir dire, trial brief, elements of claims, etc . . .	3.70
7/18/2022	Finalized Exhibit books, and pretrial submissions, verdict form and jury instructions, filed with court	2.30
7/19/2022	Receipt and review of Defendants' trial brief	0.20
7/21/2022	Attend Final Pretrial Conference in Lansing, MI	2.40

7/22/2022	Letter from Bill Jack re dates for second facilitation	0.10
7/21/2022	Drafted Plaintiff's Proposed Special Jury Instruction - Burden of Proof	0.30
7/22/2022	Receipt and review Seventh Amended CMO - adjourning Trial to 11/14/22, FPTO Conference 10/17/2022	0.10
8/12/2022	Begin preparation of Pl.'s facilitation submission	2.60
9/15/2022	Finalized Pl.'s facilitation submission and submit to Bill Jack	1.70
9/21/2022	Draft memorandum of law re: entitlement to higher damages cap on medical malpractice claim	3.50
10/3/2022	Email to R. Chap.am rejecting counter-offer of 200K, and to schedule conference to discuss jury instructions and pretrial matters	0.20
10/7/2022	Drafting amended final joint pretrial order, continued amendments to jury instructions and verdict form	1.10
10/4/2022	Compile three additional exhibits for trial 66-68 - photos and triathlon results, sent to defense counsel	0.30
10/10/2022	Draft amended FJPTO with additional exhibits	0.30
10/10/2022	Email to defense counsel re: de bene esse deposition of Pl.'s excerpt Valerie Tennesen in California	0.10
10/13/2022	Receipt and review Defs' Motion for Leave to have Rep appear at FPT Conference by Zoom	0.10
10/13/2022	Email to defense counsel with second draft of amended FJPTO	2.20
10/13/2022	Revised verdict form	0.30
10/14/2022	Email to defense counsel with revisions to verdict form	0.10
10/14/2022	Receipt and review Order granting Defs' Motion for Leave to have Rep appear at FPT Conference by Zoom	0.10
10/16/2022	Filed Proposed amended FJPTO	0.10
10/17/2022	Receipt and review Defendants' proposed special jury instructions re: contributory negligence, impaired ability to function, verdict form for deliberate indifference with proximate cause questions	0.40
10/17/2022	Appear and attend Final Pretrial Conference in Lansing, argue motions in limine	3.00
10/18/2022	Receipt and review of Order in Limine (ECF No 192)	0.10
10/24/2022	Draft and issue subpoenas to appear at trial to all defendants	0.80
10/29/2022	Review file and prepare for de bene esse deposition of Valerie Tennesse, RN	4.70
10/31/2022	Fly to Los Angeles for de bene esse deposition of Valerie Tennesen, RN	8.00
10/31/2022	Pre-deposition conference with Valerie Tennesen, RN	2.50
11/1/2022	Appear and defend de bene esse deposition of Valerie Tennesen, RN	2.20
11/1/2022	Fly back to Detroit from Los Angeles after depositions of Valerie Tennesen, R.N.	8.00
11/2/2022	Receipt and review of jury instructions and verdict form filed by Defendants	0.40
11/6/2022	Prepare examination outlines for trial	2.70
11/7/2022	Draft pared down witness and exhibit list for trial	3.20
11/7/2022	Draft subpoena to appear at trial for Dr. Stephen Cohle, and Ariel Nulty	0.30
11/8/2022	Telephone conference with Stephen Furman, RN in preparation for upcoming trial appearance	0.30
11/8/2022	Conference with Dr. Stephen Cohle in Grand Rapids in preparation for upcoming trial appearance	5.00
11/9/2022	Receipt and review Jury Questionnaires	3.30
11/9/2022	Revise voir dire and begin drafting opening statement, prepare video for opening statement	10.00
11/10/2022	Meet with Jones family in Newwaygo to prepare for trial and trial testimony	9.00

VERIFIED BILLING STATEMENT OF SERVICES AND HOURS
PERFORMED BY SARAH L. GORSKI

The undersigned hereby verifies that the attached statement accurately represents the services performed and hours incurred by attorney Sarah L. Gorski in the matter of *Jones v. Corizon Health, Inc., et. al.*

/s/ Sarah L. Gorski (P82899)

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